

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
(Chicago)**

**TIMOTHY M. KOLESSAR and CATHY  
L. KOLESSAR,**

**Plaintiffs,**

**v.**

**BMO HARRIS BANK, N.A., *et al.*,**

**Defendants.**

**Civil Action No.: 1:23-cv-13936**

**Judge: Hon. John J. Tharp, Jr.**

**Magistrate: Hon. Heather K. McShain**

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANT EXPERIAN  
INFORMATION SOLUTIONS, INC. TO ANSWER OR OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**

Defendant Experian Information Solutions, Inc. ("Experian"), by its counsel and pursuant to Federal Rule of Civil Procedure 6(b)(1), respectfully requests an extension of time, through and including December 7, 2023, to respond to Plaintiffs Timothy M. Kolessar and Cathy L. Kolessar ("Plaintiffs") Complaint, and in support thereof states:

1. Plaintiffs filed the instant action on September 20, 2023. (ECF No. 1)
2. Experian was served with process on October 17, 2023.
3. Pursuant to Rules 8 and 12 of the Federal Rules of Civil Procedure, Experian must file its responsive pleading by November 7, 2023.
4. Experian and its counsel require additional time to investigate and respond to the allegations and claims made by Plaintiffs. In addition, Experian intends to engage in good faith settlement discussions with Plaintiffs prior to filing its response to Plaintiffs' Complaint. Thus, in the event the parties are not able to resolve this matter, Experian will need sufficient time to investigate the allegations in the Complaint and prepare and file its responsive pleading.

Accordingly, Experian respectfully requests an extension of the deadline to respond to Plaintiff's Complaint, up to and including December 7, 2023.

5. This motion is made in good faith, not for purposes of delay, and granting it will not prejudice any party. This extension of time will allow Experian sufficient time to fully investigate the allegations and claims raised by Plaintiffs' Complaint, confer with counsel, and prepare its response.

6. This is Defendant Experian's first request for an extension of time.

7. On November 7, 2023, Experian conferred with Plaintiffs' counsel regarding the basis for this request and its need for an extension. Plaintiffs' counsel had no objection to the requested extension.

WHEREFORE, Experian respectfully requests that this Court grant this Motion and Order that Experian be allowed an extension of time to respond to Plaintiff's Complaint, up to and including December 7, 2023.

Respectfully submitted,

DATED: November 7, 2023

**EXPERIAN INFORMATION SOLUTIONS, INC.**

By: /s/ Stephen D. Lozier

Stephen D. Lozier  
Troutman Pepper Hamilton Sanders, LLP  
227 W. Monroe Street, Suite 3900  
Chicago, IL 60606  
Telephone: (312) 759-3203  
Facsimile: (312) 759-1939  
Email: [stephen.lozier@troutman.com](mailto:stephen.lozier@troutman.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on November 7, 2023, the foregoing Consent Motion for an Extension of Time was filed with the Court and served by operation of the Court's CM/ECF system upon all counsel of record.

/s/ Stephen D. Lozier  
Stephen D. Lozier